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Environmental Cleanup Office

435.36
04/14/99
Rev. 03

NEW SITE IDENTIFICATION

Part A – To Be Completed By Observer	
1. Person Initiating Report: Lee Tuott	Phone: 526-7990
Contractor WAG Manager: Doug Kuhns	Phone: 526-8226
2. Site Title: Contamination Discovered Southeast of CERCLA Site CPP-37b	

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

Following excavation to install a culvert in a trench for the OU 3-13 Group 1 Tank Farm Interim Action drainage system, an area with radioactively contaminated materials (construction debris) was discovered that had not been identified previously. This culvert installation took place during a 1-week period between November 20, 2000, and November 27, 2000, and was performed as part of the OU 3-13, Group 1, Tank Farm Interim Action. The culvert was installed along the east perimeter road between the two INTEC perimeter fences. The contaminated materials were located just inside the outer fence and to the southeast of CPP-37b, a CERCLA site that was previously a debris landfill. At approximately the 5-to-6-ft depth, debris was encountered consisting primarily of lava rock, gravel, and soil and minor amounts of concrete, plywood, pipe, and plastic. Only the excavation necessary to install the culvert was performed. The size of the excavation where this material was found was approximately 360 ft long x 35 ft wide. The materials extended from the 5-to-6-ft depth down to below the bottom of the excavation (approximately 14 ft) and appeared to be most prevalent on the west edge of the trench. A drawing depicting the area where the construction debris was discovered is attached. While the extent of the debris is not known at this time, it is anticipated that it extends to the west due to the debris being observed on the westerly edge of the cut for the trench. At the time of excavation, there was no radiological contamination detected on the debris.

On May 9, 2001, radiological contamination was found on some of the materials that were removed from the excavation. This contamination ranged from 35,000 disintegrations/minute (dpm) fixed beta-gamma to a maximum of 100,000 dpm fixed beta-gamma contamination. At this time, the source of the construction debris and the timeframe of the use of this site have not been identified.

Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.
WAG: 3
Operable Unit: 3-13, Site CPP-37c will be addressed as an OU 3-13 Group 3 site as identified in the OU 3-13 ROD.

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

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5. Basis for the recommendation:

As depicted in the process shown on Figure 5-1 of the WAG 3 Institutional Control Plan (DOE/ID-10729, Rev. 1), unexpected contamination was found (Box 10) that exceeded the CERCLA RAOs/RGs (Box 11) for radiological contamination. In Box 12, the question arises as to whether this should be treated as a Group 3 site. This site is close to CPP-37b, a Group 3 site used for disposal of construction debris and other materials. However, based on the review of aerial photos and discussions with personnel familiar with this area, this site does not appear to be an extension of CPP-37b.

The contaminants of potential concern (COPCs) associated with this site include the radionuclides associated with the construction debris. This material has been found to have a range of 35,000 dpm fixed beta-gamma to a maximum of 100,000 dpm fixed beta-gamma contamination. This site is similar to the existing Group 3 CPP-37 sites in that they were used for disposal of material generated during construction activities such as excess soils. concrete, basalt boulders, and piping that were removed during site preparation for INTEC infrastructure projects. Some of this material may have been radionuclide-contaminated. As identified in Table 7-1 of the WAG 3 ROD, CPP-37a COPCs are arsenic, Co-60, Am-241, Cs-137, Np-237, Pu-238, Sr-90, U-235, and U-238. The Track 2 investigation for Site CPP-37 Pit #1 indicated that arsenic was detected above background in 8 out of 14 samples collected. However, the maximum arsenic concentration was only 8.7 mg/kg relative to the background value for arsenic of 5.8 mg/kg. CPP-37b COPCs are Aroclor-1260, kepone, arsenic, Am-241, Cs-137, I-129, Np-237, Pu-238, Sr-90, U-235, and U-238. Section 5.3.3.18 of the ROD identifies that the " ... site is not a significant contributor to groundwater risk or surface exposure risk. However, since the pit was previously used as a landfill, characterization is considered insufficient to recommend no further action at this time."

As with other Group 3 sites, the primary COPC from this newly discovered site, proposed to be identified as CPP-37c, are the radiological constituents. Due to the similarity of the sources, exposure pathways, and COPCs associated with radionuclides, it is recommended that this site be treated as a CPP-37 Group 3 site, specifically CPP-37c. A hazardous waste determination will be performed on wastes generated from this site to ensure appropriate management of the material. The attached drawing depicts the limit of CPP-37c. CPP-37c includes the extent of the excavation where the contaminated debris was discovered and the exterior boundary of the construction debris pit. The sourthern edge of the gravel pit has been used as the southern boundary for CPP-37c due to the uncertainty of the actual disposal area.

Note: When reviewing CERCLA documents related to this area and aerial photos, it was determined that the CPP-37b boundary identified in the WAG 3 ROD does not accurately reflect the full extent of the excavation pit that was used for disposal. The boundary of CPP-37b will also be expanded to include the outer limits of the disposal area, based on the aerial photo information.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: Douglass J. Kuhns Signature: DJ Kuhns Date: 4-23-02

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Part C – To Be Completed By INEEL FFA/CO WAG Managers

7. WAG Operable Unit:

DOE WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: [signature]

Date: 5/2/02

EPA WAG Manager's Concurrence: ☒ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: [signature]

Date: 09/19/02

State of Idaho WAG Manager's Concurrence: ☐ Concur with recommendation. ☐ Do not concur with the recommendation.

Signature: Margie English

Date: 5-2-02

Explanation follows:

The addition of this site as a Group 3 site is a minor change that does not cause a significantly different remedy or fundamentally alter the remedy selected for similar sites in the ROD e.g., CPP-37 sites) with respect to scope, performance, or cost. In addition, this site meets the criteria for addition as a Group 3 site, as identified in the "Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13" (DOE/ID-10729 Rev. 1) The remedial design/remedial action workplan for Group 3 will be modified to include this new site.

Part D – To Be Completed By The INEEL FFA/CO Responsible Program Managers (RPM's)

8. FFA/CO RPM's Concurrence:

For DOE-ID

Name: Kathleen Hain Signature: Kathleen E Hain Date: 4/23/02

☒ Concur

☐ Do not concur. Explanation follows:

For EPA Region X

Name: Wayne Pierre Signature: [signature] Date: 9/19/02

☒ Concur

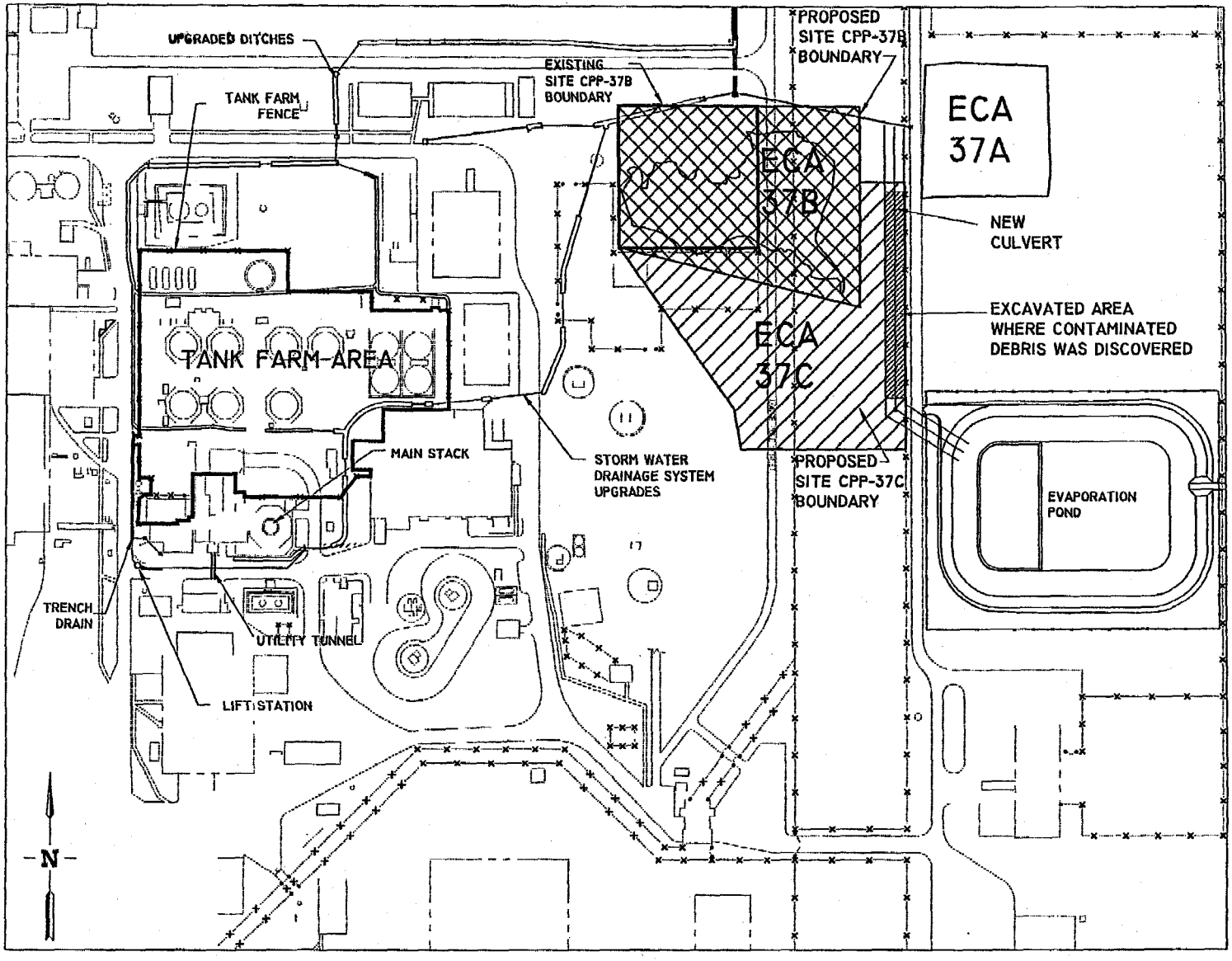
☐ Do not concur. Explanation follows:

For State of Idaho

Name: Dean Nygard Signature: [signature] Date: 5/2/02

☒ Concur

☐ Do not concur. Explanation follows:


UPGRADED DITCHES
TANK FARM FENCE
EXISTING SITE CPP-37B BOUNDARY
PROPOSED SITE CPP-37B BOUNDARY
ECA 37A
ECA 37B
ECA 37C
NEW CULVERT
EXCAVATED AREA WHERE CONTAMINATED DEBRIS WAS DISCOVERED
TANK FARM AREA
MAIN STACK
STORM WATER DRAINAGE SYSTEM UPGRADES
PROPOSED SITE CPP-37C BOUNDARY
EVAPORATION POND
TRENCH DRAIN
UTILITY TUNNEL
LIFT STATION
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